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**MEMO ENDORSED**

July 28, 2023

**Via ECF**

Hon. Valerie E. Caproni, U.S.D.J.  
United States District Court, Southern District of New York  
40 Foley Square  
New York, NY 10007

USDC SDNY  
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Re: *Black v. Cakor Restaurant, Inc. et al*  
**Case No.: 22-cv-01447-VEC**

Dear Honorable Judge Caproni:

This law firm represents Plaintiff Kara Elizabeth Black (the “Plaintiff”) in the above-referenced matter.

Pursuant to Your Honor’s Individual Motion Practice Rule 2(A), this letter respectfully serves to request an extension of time to file Plaintiff’s Motion for Default Judgement as against the non-appearing defendant Bridge Café Inc. (“Bridge Café Inc.”) from July 28, 2023 to, through and including, August 28, 2023.<sup>1</sup>

The basis of this request is that the undersigned law firm is in the process of gathering additional information from Plaintiff, in support of the Motion for Default Judgment.

In light of the foregoing, it is respectfully requested that the Court grant an extension of time to file Plaintiff’s Motion for Default Judgement as against Bridge Café Inc. from July 28, 2023 to, through and including, August 28, 2023

Thank you, in advance, for your time and attention to this matter.

Respectfully submitted,

LEVIN-EPSTEIN & ASSOCIATES, P.C.

By: /s/ Jason Mizrahi  
Jason Mizrahi  
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*Attorneys for Plaintiff*

VIA ECF: All Counsel

<sup>1</sup> The undersigned apologizes for making this application less than 48 business hours prior to the original due date.

Application DENIED without prejudice. Per the Undersigned's Individual Practices, requests for an adjournment or extension must indicate whether all parties consent. Plaintiff must also indicate the basis for her failure to submit the request within 48 hours of the original deadline.

SO ORDERED.



Date: 7/31/2023

HON. VALERIE CAPRONI  
UNITED STATES DISTRICT JUDGE